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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

IN RE: HIGH-TECH EMPLOYEE  
ANTITRUST LITIGATION

THIS DOCUMENT RELATES TO:

ALL ACTIONS

Master Docket No. 11-CV-2509-LHK

**[PROPOSED] ORDER GRANTING  
DEFENDANTS' JOINT RESPONSE TO  
PLAINTIFFS' ADMINISTRATIVE  
MOTION TO FILE UNDER SEAL**

Date Consolidated Amended Compl. Filed:  
September 13, 2011

1 Having considered Defendants' Joint Response to Plaintiffs' Administrative Motion to  
2 File Under Seal, the Motion is hereby **GRANTED**.

3 Pursuant to Northern District Civil Local Rule 79-5, (1) Portions of Plaintiffs' Reply In  
4 Support of Supplemental Motion for Class Certification; (2) Portions of Rebuttal Supplemental  
5 Expert Report of Edward E. Leamer, Ph.D.; and (3) Portions of Exhibits A through O and  
6 Plaintiffs' Deposition Exhibits 122, 1304, 2738, and 2739, attached to the Declaration of Anne  
7 B. Shaver in Support of Plaintiffs' Supplemental Motion for Class Certification filed  
8 concurrently with this Joint Response to Plaintiffs' Administrative Motion, have been properly  
9 redacted and publically filed or properly sealed in their entirety. The redacted portions and  
10 documents proposed to be sealed in their entirety shall remain under seal.  
11

12 In support of Defendants' Joint Response to Plaintiffs' Administrative Motion to File  
13 Under Seal, Defendants filed the following declarations:

- 14 • Defendant Adobe Systems Inc. filed a Declaration of Lin W. Kahn;
- 15 • Defendant Apple Inc. filed a Declaration of Christina J. Brown;
- 16 • Defendant Google filed a Declaration of Anne M. Selin;
- 17 • Defendant Intel Corp. filed a Declaration of Frank Busch; and
- 18 • Defendant Intuit Corp. filed a Declaration of Rowan T. Mason.  
19

20 **THE COURT HEREBY ORDERS** that the following documents, figures, and portions  
21 thereof be filed under seal:

22 Plaintiffs' Reply In Support of Supplemental Motion for Class Certification (Dkt. 455)  
23

- 24 • Page 3, lines 13-14
- 25 • Page 8, lines 21-22
- 26 • Footnote 4, line 28
- 27 • Page 12, lines 9-22 and 25
- 28 • Page 13, lines 1-19

- Page 14, lines 12 and 16

Expert Witness Report of Edward E. Leamer, Ph.D. (Dkt. 457)

- Paragraphs 23, 31, 33, 67-68
- Figures 1, 6-9
- Tables 1-2
- Footnote 42

Exhibits A - O and Exhibits 122, 1304, 2738, and 2739, of the Declaration of Anne B. Shaver (Dkt. 456)

- Exhibit A at pages 23-25, 68-71, 163-65, 198-99, 201, 206-209
- Exhibit D at pages 51, 53-54
- Exhibit E at pages 58-60, 63-64, 120-21
- Exhibit F at pages 46-47, 74-76, 98-102
- Exhibit G at pages 140-143
- Exhibit H at pages 181-83
- Exhibit J at pages 35-38, 68-74, 77, 80-84
- Exhibit K at pages 27-32
- Exhibit L at pages 87, 100-02, 120, 134-36, 177-78, 184, 192-93, 203, 243, 251, 260, 262
- Exhibit N at page 457
- Exhibit O at pages 96-98, 148, 167-68, 178-79, 201
- Exhibit 2738 at pages 2-5
- Exhibit 2739 at pages 7-13, 15-20, 22-27, 29-39, 41-44, 46-48, 50-53, 55, 57-60, 63-71, 74-80, 83-86, 88-92, 97-103, 105-20, 123-24, 127-47

1 Good cause having been shown, **IT IS SO ORDERED.**

2  
3 DATED: \_\_\_\_\_

By: \_\_\_\_\_  
4 HONORABLE LUCY H. KOH  
United States District Court Judge